

Message

From: Beckham, Lisa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=75A0012699094CF59508BB04E90B393C-LBECKHAM]
Sent: 9/10/2020 11:24:24 PM
To: Robert Powell [rpowell@tmtanf.org]; oquiroz@tmtanf.org; Rodney Bonner [rbonner@tmtanf.org]; 'Rodney Bonner' [rodneybonner44@gmail.com]
Subject: RE: Summary of Clean Air Act Permitting for a Pyrolysis Project

The most immediate next steps are to:

1. Determine the POTENTIAL emissions (assuming the facility overrates continuously, 8760 hours/yr) of each of the pollutants subject to the preconstruction program on a TON PER YEAR basis:
 - a. Pollutants are listed here: <https://www.epa.gov/caa-permitting/tribal-minor-new-source-review-permitting-epas-pacific-southwest-region-9#thresholds>
 - b. We would also need information on air toxic emissions for our EJ analysis: dioxin/furans, benzene, HCl, styrene, and polycyclic aromatic hydrocarbons (PAHs)
2. When providing data on potential emissions, we need to know the test methods that were used to determine emissions.
 - a. EPA's test methods: <https://www.epa.gov/emc/emc-promulgated-test-methods>
 - b. The reason we need this information is because, to my knowledge, this equipment doesn't exist in the U.S., so we don't have any existing data to draw from. For example, when someone builds a power plant we have decades of emissions data based on EPA test methods and we have a high confidence in what we expect the emissions to be. In this case, we may be starting from scratch.
3. I recommend submitting a request for an applicability determination to the EPA to see whether any incineration regulations apply.
4. Once we determine the emissions, type of permit you need, and whether it is considered an incinerator, you will need to submit an application.
 - a. <https://www.epa.gov/caa-permitting/tribal-minor-new-source-review-permitting-epas-pacific-southwest-region-9#instructions> At a minimum you will need, to submit the last one listed "New or Modified Minor Sources."
 - b. When it comes to completing an air permit application, it has some very technical aspects and for a facility like this, and you may want to consider hiring a consultant that is familiar with submitting such applications.

Lisa

-----Original Appointment-----

From: Robert Powell <rpowell@tmtanf.org>
Sent: Wednesday, September 9, 2020 3:18 PM
To: Robert Powell; oquiroz@tmtanf.org; Rodney Bonner; 'Rodney Bonner'; Beckham, Lisa
Subject: RE: Summary of Clean Air Act Permitting for a Pyrolysis Project
When: Thursday, September 10, 2020 3:00 PM-3:30 PM (UTC-08:00) Pacific Time (US & Canada).
Where: Conference call

Audio Only: Ex. 6 Personal Privacy (PP)